

Exhibit 2

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Acting Under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN,
Defendants.
Case No. CR 18-577 CRB
UNITED STATES' FIRST AMENDED WITNESS
LIST
Trial Date: March 18, 2024
Pretrial Conference: February 21, 2024

Pursuant to the Court's June 30, 2023 Scheduling Order (ECF No. 192), and following the United States respectfully submits its Amended Witness List of the individuals it may call in its case-in-chief on Counts One through Sixteen:

1. Antonia Anderson
2. Leo Apotheker
3. Neil Araujo
4. John Baiocco
5. Jan Black

- 1 6. Steven Brice
- 2 7. Dominic Camden
- 3 8. Chris Chan
- 4 9. Guy Chiarello
- 5 10. Harald Collet
- 6 11. Joe Cronin
- 7 12. John Cronin
- 8 13. Amit Daryanani
- 9 14. Christopher Egan
- 10 15. Jim Fogo
- 11 16. Al Furman
- 12 17. Thomas Garner
- 13 18. Marc Geall
- 14 19. Andy Gersh
- 15 20. Chris Goodfellow
- 16 21. Larry Feinsmith
- 17 22. Britta Huebsch or case agent
- 18 23. Brent Hogenson
- 19 24. Stephanie Horan
- 20 25. Andy Johnson
- 21 26. Robert Julien
- 22 27. Doug Kehring
- 23 28. Diane Kennelly
- 24 29. Daud Khan
- 25 30. Rob Knight
- 26 31. Richard Knights
- 27 32. David Lindsell
- 28 33. William Loomis

- 1 34. Fernando Lucini
- 2 35. Thomas Marinelli
- 3 36. Alex Marshall
- 4 37. John Meiers
- 5 38. Michael Menz
- 6 39. Nigel Mercer
- 7 40. Paul Morland
- 8 41. Tom Murray
- 9 42. Steve Ogden
- 10 43. Frank Pau
- 11 44. Alex Paul
- 12 45. Reena Prasad
- 13 46. Rahul Puri
- 14 47. Frank Quattrone
- 15 48. Alan Rizek
- 16 49. Shane Robison
- 17 50. Manish Sarin
- 18 51. Bill Scannell
- 19 52. John Schultz
- 20 53. Joel Scott
- 21 54. Christine Smeby
- 22 55. Reagan Smith
- 23 56. Jane Snider
- 24 57. Matt Stephan
- 25 58. Michael Sullivan
- 26 59. Percy Tejada
- 27 60. David Toms
- 28 61. David Truitt

- 1 62. Steve Truitt
- 2 63. Nigel Upton
- 3 64. Ganesh Vaidyanathan
- 4 65. Bill Veghte
- 5 66. Roger Wang
- 6 67. Les Welbye
- 7 68. Lee Welham
- 8 69. Chris Yelland
- 9 70. Marco Zanchini
- 10 71. Custodians of Records of
 - 11 a. Barclays
 - 12 b. BNP Paribas
 - 13 c. Cardinal Bank
 - 14 d. Capax Discovery LLC
 - 15 e. Comerica Bank
 - 16 f. Darktrace
 - 17 g. Discover Technologies LLC
 - 18 h. EMC Corporation
 - 19 i. Financial Reporting Council
 - 20 j. FTI Consulting, LLC
 - 21 k. Hewlett-Packard Enterprise and current and former affiliates
 - 22 l. HP Inc. and current and former affiliates
 - 23 m. John Marshall Bank
 - 24 n. M&T Bank
 - 25 o. Microtechnologies LLC
 - 26 p. KPMG
 - 27 q. PR Newswire
 - 28 r. Thomson Reuters (Markets) LLC

1 s. West Corporation

2 The United States reserves the right to change, modify, or supplement this list as it prepares for
3 trial.

4 DATED: December 15, 2023

5 PATRICK D. ROBBINS
6 Attorney for the United States Attorney
7 Acting Under Authority Conferred by
8 28 U.S.C. § 515

9 By: *Robert S. Leach*

10 ROBERT S. LEACH
11 ADAM A. REEVES
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13 ZACHARY G.F. ABRAHAMSON
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